Maya Jordan
23638 Lyons Avenue #261
Newhall, CA 91321
Defendant, Pro Se

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

No Exh 2

Patrick Russo

Plaintiff,

VS.

Maya Jordan and Does 1 to 20

Defendant.

CASE # CV14-0391

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. 1441 (b) (FEDERAL QUESTION)

LODGED

2014 JAN 16 PM 3:51 CLERK U.S. DISTRICT COURT CENTRAL DIST. OF CALIF. LOS ANGELES BY:

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant Maya Jordan hereby removes to this Court the state court action described below.

1) On or about October 15, 2013 a state court action was commenced against plaintiff in Los Angeles County Superior Court, California entitled PATRICK RUSSO vs. MAYA JORDAN , AND Does 1 TO 20, Case # 13R09085.

2) Defendant were served with summons and finally saw copy of Plaintiff's complaint in November, 2013. Pursuant to 28 U.S.C. 1446(b), this notice has been timely filed. A copy of the complaint and orders served upon Defendant in the state court action are attached hereto and referred hereto collectively as "Exhibit A".

3) This action is a civil action which this Court has original jurisdiction under 28 U.S.C. 1331, and is one which may be removed to this court by Defendant pursuant to the provisions of 28 U.S.C.

1441(b) in that it arises **Sec. 804. [42 U.S.C. 3604]** otherwise known as the **Fair Housing Act** governing Discrimination against both Defendant regarding rental of housing and other prohibited practices.

4) All Defendants who have been served with the summons and petition have joined in this notice of removal, as evidenced in the signing below.

5) Plaintiff s discriminatory conduct against Defendant reveal that the amount in controversy exceeds $75,000, exclusive of its court costs and reasonable and necessary attorney's fees. Thus, the amount in controversy exceeds the jurisdictional requirement of 28 U.S.C.1332(a).

WHEREFORE, Defendant Maya Jordan prays that this action be removed to the United States District Court for the District of California.

Dated: January 16, 2013

Maya Jordan, Defendant, Pro Se

EXHIBIT A

UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Yousef Monadjemi (State Bar # 231158)
Law Offices of Yousef Monadjemi
15915 Ventura Boulevard, Penthouse Two
Encino, CA 91436
TELEPHONE NO.: (818) 386-9536 FAX NO. (Optional): (818) 386-9537
E-MAIL ADDRESS (Optional): ymonadjemi@gmail.com
ATTORNEY FOR (Name): Plaintiff Patrick Russo

FOR COURT USE ONLY

FILED
Superior Court of California
County of Los Angeles
OCT 11 2013
Sherri R. Carter, Executive Officer/Clerk
By N. VALLES, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 1725 Main Street
MAILING ADDRESS:
CITY AND ZIP CODE: Santa Monica 90401
BRANCH NAME: West District

PLAINTIFF: Patrick Russo

DEFENDANT: Maya Jordan and

[X] DOES 1 TO 20

COMPLAINT — UNLAWFUL DETAINER*

[X] COMPLAINT [ ] AMENDED COMPLAINT (Amendment Number): ____

CASE NUMBER: 13R09085

Jurisdiction (check all that apply):

[X] **ACTION IS A LIMITED CIVIL CASE**
Amount demanded [X] does not exceed $10,000
[ ] exceeds $10,000 but does not exceed $25,000

[ ] **ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds $25,000)**

[ ] **ACTION IS RECLASSIFIED by this amended complaint or cross-complaint (check all that apply):**
[ ] from unlawful detainer to general unlimited civil (possession not in issue)
[ ] from unlawful detainer to general limited civil (possession not in issue)
[ ] from limited to unlimited
[ ] from unlimited to limited

1. PLAINTIFF (name each): Patrick Russo

alleges causes of action against DEFENDANT (name each): Maya Jordan and Does 1 to 20

2. a. Plaintiff is (1) [X] an individual over the age of 18 years. (4) [ ] a partnership.
(2) [ ] a public agency. (5) [ ] a corporation.
(3) [ ] other (specify):

b. [ ] Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of (specify):

3. Defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):
14265 Terra Bella Street, Unit 26, (upstairs master bedroom with bathroom, north side of unit) Panorama City CA 91402

4. Plaintiff's interest in the premises is [X] as owner [ ] other (specify):

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

6. a. On or about (date): 05/05/2013 defendant (name each): Maya Jordan

(1) agreed to rent the premises as a [ ] month-to-month tenancy [X] other tenancy (specify): 2 Month Tenancy
(2) agreed to pay rent of $635.00 payable [X] monthly [ ] other (specify frequency):
(3) agreed to pay rent on the [X] first of the month [ ] other day (specify):

b. This [X] written [ ] oral agreement was made with
(1) [X] plaintiff.
(2) [ ] plaintiff's agent.
(3) [ ] plaintiff's predecessor in interest.
(4) [ ] other (specify):

* **NOTE:** Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).

Form Approved for Optional Use
Judicial Council of California
UD-100 [Rev. July 1, 2005]

COMPLAINT—UNLAWFUL DETAINER

Civil Code, § 1940 et seq.
Code of Civil Procedure §§ 425.12, 1166
www.courtinfo.ca.gov

LexisNexis® Automated California Judicial Council Forms

tweer

PLAINTIFF *(Name)*: Russo	CASE NUMBER:
DEFENDANT*(Name)*: Jordan, Et Al.	

6. c. [X] The defendants not named in item 6a are
   (1) [ ] subtenants.
   (2) [X] assignees.
   (3) [X] other *(specify)*: Unauthorized Occupants
   d. [ ] The agreement was later changed as follows *(specify)*:

   e. [ ] A copy of the written agreement, including any addenda or attachments that form the basis of this complaint, is attached and labeled Exhibit 1. *(Required for residential property, unless item 6f is checked. See Code Civ. Proc., § 1166.)*
   f. [X] *(For residential property)* A copy of the written agreement is **not** attached because *(specify reason)*:
   (1) [ ] the written agreement is not in the possession of the landlord or the landlord's employees or agents.
   (2) [X] this action is solely for nonpayment of rent (Code Civ. Proc., § 1161(2)).

7. [X] a. Defendant *(name each)*: Maya Jordan and All Others in Possession

was served the following notice on the same date and in the same manner:

(1) [X] 3-day notice to pay rent or quit
(2) [ ] 30-day notice to quit
(3) [ ] 60-day notice to quit
(4) [ ] 3-day notice to perform covenants or quit
(5) [ ] 3-day notice to quit
(6) [ ] Other *(specify)*:

b. (1) On *(date)*: 10/09/2013 the period stated in the notice expired at the end of the day.
(2) Defendants failed to comply with the requirements of the notice by that date.
c. All facts stated in the notice are true.
d. [X] The notice included an election of forfeiture.
e. [X] A copy of the notice is attached and labeled Exhibit 2. *(Required for residential property. See Code Civ. Proc., § 1166.)*
f. [ ] One or more defendants were served (1) with a different notice, (2) on a different date, or (3) in a different manner, as stated in Attachment 8c. *(Check item 8c and attach a statement providing the information required by items 7a–e and 8 for each defendant.)*

8. a. [X] The notice in item 7a was served on the defendant named in item 7a as follows:
(1) [ ] by personally handing a copy to defendant on *(date)*:
(2) [ ] by leaving a copy with *(name or description)*:
a person of suitable age and discretion, on *(date)*: at defendant's
[ ] residence [ ] business AND mailing a copy to defendant at defendant's place of residence on *(date)*: because defendant cannot be found at defendant's residence or usual place of business.
(3) [X] by posting a copy on the premises on *(date)*: 10/05/2013 [ ] AND giving a copy to a person found residing at the premises AND mailing a copy to defendant at the premises on *(date)*: 10/05/2013
(a) [X] because defendant's residence and usual place of business cannot be ascertained OR
(b) [X] because no person of suitable age or discretion can be found there.
(4) [ ] *(Not for 3-day notice; see Civil Code, § 1946 before using)* by sending a copy by certified or registered mail addressed to defendant on *(date)*:
(5) [ ] *(Not for residential tenancies; see Civil Code, § 1953 before using)* in the manner specified in a written commercial lease between the parties.

b. [ ] *(Name)*:
was served on behalf of all defendants who signed a joint written rental agreement.
c. [ ] Information about service of notice on the defendants alleged in item 7f is stated in Attachment 8c.
d. [X] Proof of service of the notice in item 7a is attached and labeled Exhibit 3.

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

Russo v. Jordan, Et Al.

[X] I am a party to this action.

[ ] I am ____ an Officer ____ a Partner ____ an Agent ___ the Conservator of a party to this action. I am authorized to make this verification on behalf of that party.

[ ] I am one of the lawyers for a party to this action. Such party is absent from the county where the party's lawyers have their offices. I make this verification for the reason of the party's absence.

I have read the foregoing:

DISCOVERY	OTHER
[ ] Responses to Form Interrogatories	[ ] Complaint
[ ] Responses to Special Interrogatories	[X] Unlawful Detainer Complaint
[ ] Responses to Supplemental Interrogatories	[ ] Answer
[ ] Responses to Request For Admissions	[ ] Petition
[ ] Responses to Demand For Inspection and Production of Documents	

I know its contents.

[X] The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe, them to be true.

[ ] I am informed and believe that the matters stated in the foregoing document are true and upon that ground I make this verification.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

I have executed this verification at Encino, California.

Dated: 10/10/2013

Patrick Russo

Patrick Russo

EXHIBIT "2"

3-Day Notice

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

CIVIL COVER SHEET

I. (a) PLAINTIFFS (Check box if you are representing yourself ☐)

Patrick Russo

DEFENDANTS (Check box if you are representing yourself ☐)

Maya Jordan and Does 1 to 20

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (*Firm Name, Address and Telephone Number*) If you are representing yourself, provide the same information.

Yousef Monadjemi
15915 Ventura Blvd. Penthouse Two
Encino, CA 91436

Attorneys (*Firm Name, Address and Telephone Number*) If you are representing yourself, provide the same information.

Maya Jordan
23638 Lyons Avenue #261
Newhall, CA 91321

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff
- ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant
- ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated or Principal Place of Business in this State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. ORIGIN (Place an X in one box only.)

☐ 1. Original Proceeding ☒ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No ☒ **MONEY DEMANDED IN COMPLAINT:** $ 75,000.00

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Violation of HUD Laws

VII. NATURE OF SUIT (Place an X in one box only).

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce/ICC Rates/Etc.
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced & Corrupt Org.
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Info. Act
- ☐ 896 Arbitration
- ☐ 899 Admin. Procedures Act/Review of Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loan (Excl. Vet.)
- ☐ 153 Recovery of Overpayment of Vet. Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment

REAL PROPERTY CONT.
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Fed. Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury-Med Malpratice
- ☐ 365 Personal Injury-Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

TORTS PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☒ 443 Housing/ Accomodations
- ☐ 445 American with Disabilities-Employment
- ☐ 446 American with Disabilities-Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus/Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Mgmt. Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Ret. Inc. Security Act

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405 (g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405 (g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number: CV14-0391

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? ☒ Yes ☐ No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:	INITIAL DIVISION IN CACD IS:
	☒ Los Angeles	Western
	☐ Ventura, Santa Barbara, or San Luis Obispo	Western
	☐ Orange	Southern
	☐ Riverside or San Bernardino	Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? ☐ Yes ☒ No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	☐ Los Angeles	☐ Los Angeles	Western
	☐ Ventura, Santa Barbara, or San Luis Obispo	☐ Ventura, Santa Barbara, or San Luis Obispo	Western
	☐ Orange	☐ Orange	Southern
	☐ Riverside or San Bernardino	☐ Riverside or San Bernardino	Eastern
	☐ Other	☐ Other	Western

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	☒	☐	☐	☐	☐	☐
Indicate the location in which a majority of defendants reside:	☒	☐	☐	☐	☐	☐
Indicate the location in which a majority of claims arose:	☒	☐	☐	☐	☐	☐

C.1. Is either of the following true? If so, check the one that applies:

☐ 2 or more answers in Column C

☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the SOUTHERN DIVISION.
Enter "Southern" in response to Question D, below.

If none applies, answer question C2 to the right. →

C.2. Is either of the following true? If so, check the one that applies:

☐ 2 or more answers in Column D

☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the EASTERN DIVISION.
Enter "Eastern" in response to Question D, below.

If none applies, go to the box below. ↓

Your case will initially be assigned to the WESTERN DIVISION.
Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	Western Division

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

IX(a). IDENTICAL CASES: Has this action been previously filed **in this court** and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed **in this court** that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)
- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT): _____ DATE: January 16, 2014

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))